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VIOLET BLUE

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

VIOLET BLUE, an Individual,
Plaintiff and Counter-defendant,
v.

ADA MAE JOHNSON a/k/a ADA
WOFFINDEN, an individual d/b/a
VIOLET BLUE a/k/a VIOLET a/k/a
VIOLET LUST; ASSASSIN PICTURES
INC., a California Corporation;
ASSASSINCASH.COM; BILL T. FOX,
an individual, a/k/a BILL FOX; FIVE
STAR VIDEO L.C., an Arizona Limited
Liability Company a/k/a Five Star Video
Distributors LLC d/b/a Five Star
Fulfillment; and DOES 1-10,

Defendants and Counter-claimants.

Case No. C 07-5370 SI

**[PROPOSED] ORDER GRANTING
PLAINTIFF VIOLET BLUE'S
NOTICE OF MOTION AND MOTION
FOR PRELIMINARY INJUNCTION**

The Honorable Susan Illston
Courtroom 10, 19th Floor
450 Golden Gate Avenue
San Francisco, CA 94102

Hearing Date: May 9, 2008
Hearing Time: 9:00 a.m.

The motion of Plaintiff Violet Blue for a preliminary injunction enjoining Defendant and Counterclaim Plaintiff Ada Woffinden ("Woffinden"); Assassin Pictures Inc., a California corporation ("Assassin"); Assassincash.com ("Cash"); Bill T. Fox, an individual, a/k/a Bill Fox ("Fox"); Five Star Video L.C., an Arizona limited liability company a/k/a Five Star Video Distributors LLC d/b/a Five Star Fulfillment ("Five Star"); and Does 1-10 (collectively

1 “Defendants”), and their officers, directors, agents, servants, employees, members, attorneys,
2 distributors and all other persons acting or attempting to act in concert or participation with them,
3 came on for hearing on May 9, 2008, before this Court, the Honorable Judge Susan Illston
4 presiding. All interested parties were represented by counsel and given an opportunity to be
5 heard.

6 The Court, having read and considered the papers submitted, and having heard the
7 argument of counsel, hereby ORDERS as follows:

8 1. Defendants, any associated businesses of Defendants, and their officers, directors,
9 agents, servants, employees, members, attorneys, distributors, and all other persons, firms or
10 corporations, acting in concert and participation with them, their successors and assigns, are
11 hereby enjoined from:

- 12 a) using names, trademarks, and Internet domains confusingly similar to, or
13 identical to, Plaintiff's trademark VIOLET BLUE (including the name
14 “Violetta Blue”);
- 15 b) infringing any of Plaintiff's trademark rights;
- 16 c) identifying themselves as Violet Blue;
- 17 d) using the phrase “Violet Blue” in association with any goods or service;
- 18 e) attempting to trade upon Plaintiff's goodwill by capitalizing on the Violet
19 Blue name through inclusion of "Violet Blue" history, or by referencing
20 her former appearances as “Violet Blue”;

21 2. Defendants, within twenty (20) calendar days of this order, are to cause any
22 Internet domain within their control, including but not limited to <http://www.violetblue.org> and
23 <http://xxx.violetblue.org>, to be inactive, so that a browser directed to any such page is not aliased
24 to any other website and email to [anything]@violetblue.org is not delivered to any email
25 system.

26 3. Defendants are to remove, within twenty (20) calendar days of this order, their
27 confusingly similar trademarks and prohibited content from all materials to be distributed to the
28 public, including through Defendants' website.

